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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

JOINT STATUS UPDATE

Judges: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
Courtroom: VIA VIDEOCONFERENCE
Hearing Date: July 28, 2021
Hearing Time: 8:30 a.m.

Since the June 23 conference, the parties have had three full-day mediation sessions on June 28, July 6, and July 22.

Consistent with the Court's June 23 Order (Dkt. 693), the June 28 session was dedicated to working to resolve or narrow the three discovery disputes the Court ordered the parties to resolve or brief by July 2.

At the July 6 session, the parties largely discussed a process for drafting a stipulated Rule 53 protocol for submission to the Court, the timing of certain depositions (which was resolved by the Court's Order Setting Case Schedule, Dkt. No. 706), the prioritization of the production of certain materials in response to Plaintiffs' outstanding discovery requests, and Facebook's inquiry into whether certain document requests could be narrowed.

In advance of the July 22 session, the parties each submitted topics to Judge Andler and Mr. Garrie that they would like to resolve in the short term. At the July 22 session, the parties began working to address these topics, resolved a dispute regarding the timing of certain non-party depositions, and discussed Plaintiffs' requests for production of various noncustodial documents. The parties also began working on a more detailed Rule 53 stipulation and proposed order to ensure that the order governing Daniel Garrie's appointment as a special master addresses all of the Rule 53 requirements. The parties are exchanging drafts of the stipulation and proposed order and hope to submit it shortly.

Finally, the parties will adhere to the guidance set forth in the Court's recent orders (Dkt. 711 & 712), including by working with the discovery mediators and Mr. Garrie as special master as appropriate.

Dated: July 27, 2021

Respectfully submitted,

KELLER ROHRBACK L.L.P.

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CERTIFICATE OF SERVICE

I, Elizabeth M Sainte, hereby certify that on July 27, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

Elizabeth Sainte

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